

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
**CHARGE AGAINST EMPLOYER****DO NOT WRITE IN THIS SPACE**

Case

Date Filed

**INSTRUCTIONS:**

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

**1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT**

a. Name of Employer Kansas City Royals Baseball Club LLC		b. Tel. No. (816) 504-4191
		c. Cell No.
		f. Fax. No.
d. Address ( <i>Street, city, state, and ZIP code</i> ) One Royal Way  MO Kansas City 64129	e. Employer Representative (b) (6), (b) (7)(C) [REDACTED]	g. e-mail  (b) (6), (b) (7)(C)@royals.co
		h. Number of workers employed 250
i. Type of Establishment ( <i>factory, mine, wholesaler, etc.</i> ) Others	j. Identify principal product or service Sports/Entertainment	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) 1,5 of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

**2. Basis of the Charge (*set forth a clear and concise statement of the facts constituting the alleged unfair labor practices*)**

--See additional page--

**3. Full name of party filing charge (*if labor organization, give full name, including local name and number*)**Chris Rak  
Service Employees International Union, Local 1

4a. Address ( <i>Street and number, city, state, and ZIP code</i> )  2725 Clifton Ave. MO St. Louis 63139	4b. Tel. No. (314) 437-3420
	4c. Cell No.
	4d. Fax No.
	4e. e-mail rakc@seiu1.org

**5. Full name of national or international labor organization of which it is an affiliate or constituent unit (*to be filled in when charge is filed by a labor organization*)****6. DECLARATION**

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.



Michele Cotrupe

(signature of representative or person making charge)

(Print/type name and title or office, if any)

111 E. Wacker Dr. Suite 1700

Address Chicago IL 60601

Date 05/22/2023 12:49:52 PM

Tel. No.  
(312) 233-8719

Office, if any, Cell No.

Fax No.

e-mail  
cotrupem@seiu1.org**WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT**

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 *et seq.* The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.

## Basis of the Charge

### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by threatening to retaliate against employees if they joined or supported a union.

Name of Employer's Agent/Representative who made the statement	Approximate date
multiple	04/08/2023
(b) (6), (b) (7)(C)	01/17/2023

### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by engaging in surveillance or creating impression of surveillance of employees' union activities.

Name of Employer's Agent/Representative who made the statement	Approximate date
multiple	05/10/2023
multiple	03/30/2023

### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by interrogating employees about their union activities.

Name of Employer's Agent/Representative who made the statement	Approximate date
multiple	05/08/2023
multiple	05/09/2023
multiple	03/30/2023

### 8(a)(1)

Within the previous six-months, the Employer has interfered with, restrained, and coerced its employees in the exercise of rights protected by Section 7 of the Act by maintaining work rules that prohibit employees from discussing wages, hours, or other terms or conditions of employment.

### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees.

### 8(a)(5)

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees by making unilateral changes in terms and conditions of employment.

List Changes	Approximate date of change
Implementation of electronic Ticket Taker machines	04/01/2023
Increased health insurance premiums	01/01/2023
Refusal to process updates to dues collection	01/01/2023

**8(a)(5)**

Within the previous six months, the Employer failed and refused to bargain in good faith with the union as the collective bargaining representative of its employees by failing to furnish information requested by the union.

Date of request	Employer representative	List items requested	Date refused
01/17/2023	(b) (6), (b) (7)(C)	Employee Data and other bargaining info	05/22/2023



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 17  
8600 Farley St Ste 100  
Overland Park, KS 66212-4677

Agency Website: [www.nlr.gov](http://www.nlr.gov)  
Telephone: (913)967-3000  
Fax: (913)967-3010



Download  
NLRB  
Mobile App

May 22, 2023

(b) (6), (b) (7)(C)

Kansas City Royals Baseball Club LLC  
One Royal Way  
Kansas City, MO 64129

Re: Kansas City Royals Baseball Club LLC  
Case 14-CA-318495

Dear (b) (6), (b) (7)(C):

Enclosed is a copy of a charge that has been filed in this case. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney JULIE M. COVEL whose telephone number is (913)275-6537. If this Board agent is not available, you may contact Supervisory Field Attorney WILLIAM LEMASTER whose telephone number is (913)275-6524.

**Right to Representation:** You have the right to be represented by an attorney or other representative in any proceeding before us. If you choose to be represented, your representative must notify us in writing of this fact as soon as possible by completing *Form NLRB-4701, Notice of Appearance*. This form is available on our website, [www.nlr.gov](http://www.nlr.gov), or from an NLRB office upon your request.

If you are contacted by someone about representing you in this case, please be assured that no organization or person seeking your business has any "inside knowledge" or favored relationship with the National Labor Relations Board. Their knowledge regarding this proceeding was only obtained through access to information that must be made available to any member of the public under the Freedom of Information Act.

**Presentation of Your Evidence:** We seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations set forth in the charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

Full and complete cooperation includes providing witnesses to give sworn affidavits to a Board agent, and providing all relevant documentary evidence requested by the Board

agent. Sending us your written account of the facts and a statement of your position is not enough to be considered full and complete cooperation. A refusal to fully cooperate during the investigation might cause a case to be litigated unnecessarily.

In addition, either you or your representative must complete the enclosed Commerce Questionnaire to enable us to determine whether the NLRB has jurisdiction over this dispute. If you recently submitted this information in another case, or if you need assistance completing the form, please contact the Board agent.

We will not honor requests to limit our use of position statements or evidence. Specifically, any material you submit may be introduced as evidence at a hearing before an administrative law judge regardless of claims of confidentiality. However, certain evidence produced at a hearing may be protected from public disclosure by demonstrated claims of confidentiality.

Further, the Freedom of Information Act may require that we disclose position statements or evidence in closed cases upon request, unless an exemption applies, such as those protecting confidential financial information or personal privacy interests.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Correspondence:** All documents submitted to the Region regarding your case MUST be filed through the Agency's website, [www.nlr.gov](http://www.nlr.gov). This includes all formal pleadings, briefs, as well as affidavits, documentary evidence, and position statements. The Agency requests all evidence submitted electronically to be in the form it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format).

If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge. If you cannot e-file your documents, you must provide a statement explaining why you do not have access to the means for filing electronically or why filing electronically would impose an undue burden.

In addition, this Region will be issuing case-related correspondence and documents, including complaints, compliance specifications, dismissal letters, deferral letters, and withdrawal letters, electronically to the email address you provide. To ensure that you receive important case-related correspondence, please ensure that the Board Agent assigned to your case has your preferred email address. These steps will ensure that you receive correspondence faster and at a significantly lower cost to the taxpayer. If there is some reason you are unable to receive correspondence via email, please contact the agent assigned to your case to discuss the circumstances that prevent you from using email.

**Controlled Unclassified Information (CUI):** This National Labor Relations Board (NLRB) proceeding may contain Controlled Unclassified Information (CUI). Subsequent information in this proceeding may also constitute CUI. National Archives and Records Administration (NARA) regulations at 32 CFR Part 2002 apply to all executive branch agencies that designate or handle information that meets the standards for CUI.

\* \* \*

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,



ANDREA J. WILKES  
Regional Director

AJW:rml

Enclosures

**UNITED STATES OF AMERICA**  
**BEFORE THE NATIONAL LABOR RELATIONS BOARD**

**KANSAS CITY ROYALS BASEBALL CLUB  
LLC**

Charged Party

and

**SERVICE EMPLOYEES INTERNATIONAL  
UNION, LOCAL 1**

Charging Party

**Case 14-CA-318495**

**AFFIDAVIT OF SERVICE OF CHARGE AGAINST EMPLOYER**

I, the undersigned employee of the National Labor Relations Board, state under oath that on May 22, 2023, I served the above-entitled document(s) by post-paid regular mail upon the following persons, addressed to them at the following addresses:

**(b) (6), (b) (7)(C)**

Kansas City Royals Baseball Club LLC  
One Royal Way  
Kansas City, MO 64129

May 22, 2023

Date

Regina Lewis, Designated Agent of NLRB

Name

/s/ *Regina Lewis*

Signature



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 17  
8600 Farley St Ste 100  
Overland Park, KS 66212-4677

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (913)967-3000  
Fax: (913)967-3010



Download  
NLRB  
Mobile App

May 22, 2023

Chris Rak  
Service Employees International Union, Local 1  
2725 Clifton Ave.  
St. Louis, MO 63139

Re: Kansas City Royals Baseball Club LLC  
Case 14-CA-318495

Dear Mr. Rak:

The charge that you filed in this case on May 22, 2023 has been docketed as case number 14-CA-318495. This letter tells you how to contact the Board agent who will be investigating the charge, explains your right to be represented, discusses presenting your evidence, and provides a brief explanation of our procedures, including how to submit documents to the NLRB.

**Investigator:** This charge is being investigated by Field Attorney JULIE M. COVEL whose telephone number is (913)275-6537. If this Board agent is not available, you may contact Supervisory Field Attorney WILLIAM LEMASTER whose telephone number is (913)275-6524.

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**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. Because we seek to resolve labor disputes promptly, you should be ready to promptly present your affidavit(s) and other evidence. If you have not yet scheduled a date and time for the Board agent to take your affidavit, please contact the Board agent to schedule the affidavit(s). If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed without investigation.



**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

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\* \* \*

Information about the Agency, the procedures we follow in unfair labor practice cases and our customer service standards is available on our website, [www.nlr.gov](http://www.nlr.gov) or from an NLRB

office upon your request. *NLRB Form 4541, Investigative Procedures* offers information that is helpful to parties involved in an investigation of an unfair labor practice charge.

We can provide assistance for persons with limited English proficiency or disability. Please let us know if you or any of your witnesses would like such assistance.

Very truly yours,



ANDREA J. WILKES  
Regional Director

AJW:rml  
Enclosure

1. Important Information About NLRB Investigations for Immigrant Workers (English & Spanish)

cc: Michele Cotrupe  
Service Employees International Union,  
Local 1  
111 E. Wacker Dr.  
Suite 1700  
Chicago, IL 60601



## Important Information About NLRB Investigations for Immigrant Workers



**The National Labor Relations Act (NLRA) protects most private-sector employees, regardless of their immigration status. The NLRA gives employees the right to:**

- Form, join, or assist a union to negotiate concerning wages and other working conditions.
- Discuss wages and other working conditions with coworkers, a union, a worker center, a government agency, the media, or the public.
- Take collective action with coworkers to try to improve wages and other working conditions.
- Choose not to take part in any of these actions.

**Below is important information for you to know about our confidential investigation process:**

- Because immigration status is not relevant as to whether there has been a violation of the NLRA:
  - We will **NOT** ask you about your immigration status.
  - You **DO NOT** need to share any information with us about your immigration status.
  - You **DO NOT** need to share information about the status of your current/former coworkers.
- We only enforce the NLRA and have **NO** involvement with the enforcement of immigration laws.
- We will **NOT** share any information about you with the Department of Homeland Security (DHS), including Immigration and Customs Enforcement (ICE), or any other immigration authorities, unless you request that we share your information to assist you with seeking immigration relief, as described in the last bulleted point of this document.
- If you have concerns about appearing at our offices for any reason, please speak with the Board Agent assigned to the case about other methods of participating in the investigation, including taking your affidavit outside of our office or by video.
- Our investigations are confidential, which means that we will **NOT** disclose your affidavit to an employer, unless you testify at a trial, or we seek a federal court injunction.
- If you are not comfortable communicating with us in English, we will make an interpreter available to provide assistance and information in your preferred language.
- If you are aware that an employer or union has engaged in any of the following conduct, please tell the Board Agent about it because it may violate the law:

- Threatening to call DHS or ICE or making other similar threats because you or other employees have engaged in union activity or other collective action to improve working conditions.
  - Asking employees to provide new or updated immigration documents/papers or reverifying employees' work authorization without a valid, non-discriminatory reason, which could violate the NLRA or other laws.
- If, at the end of the investigation, we determine there is merit to the charge (the employer or union has violated the law) and we have to litigate the case before an Administrative Law Judge, we will make every effort to prevent the employer or union from asking you about your immigration status.
- If you have filed a charge or are a witness and you or your representative tells us that there is NLRA protected activity at a worksite and immigration relief is necessary to protect employees who are exercising those rights or participating in the NLRB process, the NLRB will consider seeking immigration relief for employees at that worksite including deferred action, parole, U or T visa status, or other relief as available and appropriate. The NLRB cannot provide immigration advice. If you need immigration counsel, a list of providers of free legal services is available here:  
<https://www.justice.gov/eoir/list-pro-bono-legal-service-providers>.

**For more information on the NLRB, please visit our website, [www.nlrb.gov](http://www.nlrb.gov).**



## Información Importante Acerca de las Investigaciones de la NLRB para los Trabajadores Inmigrantes



**La Ley Nacional de Relaciones del Trabajo (NLRA por sus siglas en inglés) protege a la mayoría de los empleados del sector privado, independientemente de su estatus migratorio.**

**La NLRA les da a los empleados el derecho a:**

- Formar, afiliarse o ayudar a una unión para negociar sobre los salarios y otras condiciones de trabajo.
- Discutir los salarios y otras condiciones de trabajo con los compañeros de trabajo, una unión, un centro de trabajadores, una agencia gubernamental, los medios de comunicación o el público.
- Tomar acciones colectivas con los compañeros de trabajo para tratar de mejorar los salarios y otras condiciones de trabajo.
- Optar por no participar en ninguna de estas acciones.

**A continuación, le presentamos información importante que debe conocer acerca de nuestro proceso de investigación confidencial:**

- Porque el estatus migratorio no es pertinente si ha habido una violación de la NLRA:
  - Nosotros **NO** le preguntaremos sobre su estatus migratorio.
  - Usted **NO NECESITA** compartir ninguna información con nosotros acerca de su estatus migratorio.
  - Usted **NO NECESITA** compartir ninguna información sobre el estatus [migratorio] de sus actuales/antiguos compañeros de trabajo.
- Sólo hacemos cumplir la NLRA y **NO** estamos involucrados en el cumplimiento de las leyes de inmigración.
- **NO** compartimos ninguna información sobre usted con el Departamento de Seguridad Nacional (DHS por sus siglas en inglés), incluyendo el Servicio de Inmigración y Control de Aduanas (ICE por sus siglas en inglés) o cualquier otra autoridad de inmigración, a menos que usted solicite que compartamos su información para ayudarlo a buscar alivio migratorio, como se describe en el último punto de este documento.
- Si tiene preocupaciones acerca de presentarse en nuestras oficinas por cualquier razón, por favor hable con el agente de la Junta asignado al caso sobre otras maneras de participar en la investigación, incluyendo tomar su declaración jurada fuera de nuestra oficina o por video.
- Nuestras investigaciones son confidenciales, lo que significa que **NO** divulgaremos su declaración jurada a un empleador, a menos que usted testifique en un juicio, o que busquemos un mandato judicial federal.
- Si no está cómodo/a comunicándose con nosotros en inglés, tendremos un intérprete disponible para proporcionarle asistencia e información en su idioma predilecto.

- Si usted sabe que un empleador o unión ha incurrido en alguna de las siguientes conductas, por favor infórmele al agente de la Junta ya que puede violar la ley:
  - Amenazar con llamar al DHS o al ICE o hacer otras amenazas similares porque usted u otros empleados han participado en actividades sindicales u otras acciones colectivas para mejorar las condiciones de trabajo.
  - Pedir a los empleados que proporcionen documentos/papeles de inmigración nuevos o actualizados o volver a verificar la autorización de trabajo de los empleados sin una razón válida y no discriminatoria, que podría violar la NLRA u otras leyes.
- Si, al final de la investigación, determinamos que el cargo tiene mérito (el empleador o la unión han violado la ley) y tenemos que litigar el caso frente a un Juez de Ley Administrativa, haremos todo lo posible para evitar que el empleador o la unión le pregunten sobre su estatus migratorio.
- Si usted ha presentado un cargo o es un testigo y usted o su representante nos dice que se hay una actividad protegida por la NLRA en un lugar de trabajo y que es necesario un alivio migratorio para proteger a los empleados que están ejerciendo esos derechos o participando en el proceso de la Junta Nacional de Relaciones del Trabajo (NLRB por sus siglas en ingles), la NLRB considerará la posibilidad de buscar un alivio migratorio para los empleados en ese lugar de trabajo, incluyendo la acción diferida, la libertad condicional, visas U o T u otro alivio en la medida en que esté disponible y sea apropiado. La NLRB no puede proporcionar asesoramiento de inmigración. Si necesita asesoramiento de inmigración, una lista de proveedores de servicios legales sin costo se encuentra disponible aquí (en inglés): <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers>.

**Para más información acerca de la NLRB, por favor visite nuestra página web, [www.nlrb.gov](http://www.nlrb.gov).**

NATIONAL LABOR RELATIONS BOARD

NOTICE OF APPEARANCE

Kansas City Royals Baseball Club, LLC.

and

Service Employees International Union, Local 1

CASE 14-CA-318495

☒ REGIONAL DIRECTOR

☐ EXECUTIVE SECRETARY  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

☐ GENERAL COUNSEL  
NATIONAL LABOR RELATIONS BOARD  
Washington, DC 20570

THE UNDERSIGNED HEREBY ENTERS APPEARANCE AS REPRESENTATIVE OF \_\_\_\_\_  
Kansas City Royals Baseball Club, LLC.

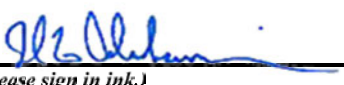
IN THE ABOVE-CAPTIONED MATTER.

CHECK THE APPROPRIATE BOX(ES) BELOW:

☒ REPRESENTATIVE IS AN ATTORNEY

☒ IF REPRESENTATIVE IS AN ATTORNEY, IN ORDER TO ENSURE THAT THE PARTY MAY RECEIVE COPIES OF CERTAIN DOCUMENTS OR CORRESPONDENCE FROM THE AGENCY IN ADDITION TO THOSE DESCRIBED BELOW, THIS BOX MUST BE CHECKED. IF THIS BOX IS NOT CHECKED, THE PARTY WILL RECEIVE ONLY COPIES OF CERTAIN DOCUMENTS SUCH AS CHARGES, PETITIONS AND FORMAL DOCUMENTS AS DESCRIBED IN SEC. 11842.3 OF THE CASEHANDLING MANUAL.

(REPRESENTATIVE INFORMATION)

NAME: Joel Abrahamson  
MAILING ADDRESS: 50 South Sixth Street, Suite 2600  
E-MAIL ADDRESS: joel.abrahamson@stinson.com  
OFFICE TELEPHONE NUMBER: 612-335-7006  
CELL PHONE NUMBER: 612-961-1182 FAX: \_\_\_\_\_  
SIGNATURE:   
(Please sign in ink.)  
DATE: \_\_\_\_\_

<sup>1</sup> IF CASE IS PENDING IN WASHINGTON AND NOTICE OF APPEARANCE IS SENT TO THE GENERAL COUNSEL OR THE EXECUTIVE SECRETARY, A COPY SHOULD BE SENT TO THE REGIONAL DIRECTOR OF THE REGION IN WHICH THE CASE WAS FILED SO THAT THOSE RECORDS WILL REFLECT THE APPEARANCE.

UNITED STATES OF AMERICA  
NATIONAL LABOR RELATIONS BOARD  
FIRST AMENDED CHARGE AGAINST EMPLOYER

DO NOT WRITE IN THIS SPACE

Case  
14-CA-318495Date Filed  
August 1, 2023

## INSTRUCTIONS:

File an original with NLRB Regional Director for the region in which the alleged unfair labor practice occurred or is occurring.

## 1. EMPLOYER AGAINST WHOM CHARGE IS BROUGHT

a. Name of Employer Kansas City Royals Baseball Club, LLC		b. Tel. No. 816-504-4191
		c. Cell No.
		f. Fax No.
d. Address (Street, city, state, and ZIP code) One Royal Way Kansas City, MO 64129	e. Employer Representative (b) (6), (b) (7)(C)	g. e-mail (b) (6), (b) (7)(C)@royals.com
		h. Number of workers employed 250
i. Type of Establishment (factory, mine, wholesaler, etc.) Other	j. Identify principal product or service Sports/Entertainment	

The above-named employer has engaged in and is engaging in unfair labor practices within the meaning of section 8(a), subsections (1) and (list subsections) (1), (3), (5) of the National Labor Relations Act, and these unfair labor practices are practices affecting commerce within the meaning of the Act, or these unfair labor practices are practices affecting commerce within the meaning of the Act and the Postal Reorganization Act.

## 2. Basis of the Charge (set forth a clear and concise statement of the facts constituting the alleged unfair labor practices)

See Attachment.

## 3. Full name of party filing charge (if labor organization, give full name, including local name and number)

Service Employees International Union, Local 1

4a. Address (Street and number, city, state, and ZIP code) 2725 Clifton Ave. St. Louis, MO 63139	4b. Tel. No. 314-437-3420
	4c. Cell No.
	4d. Fax No.
	4e. e-mail rakc@seiu1.org

## 5. Full name of national or international labor organization of which it is an affiliate or constituent unit (to be filled in when charge is filed by a labor organization)

Service Employees International Union

## 6. DECLARATION

I declare that I have read the above charge and that the statements  
are true to the best of my knowledge and belief.  
(signature of representative or person making charge)

Michele Cotrupe, Counsel

(Print/type name and title or office, if any)

Address 111 E. Wacker Dr., Suite 1700, Chicago, IL 60601

Date 8-1-23

Tel. No. 312-233-8719
Office, if any, Cell No.
Fax No.
e-mail cotrupem@seiu1.org

WILLFUL FALSE STATEMENTS ON THIS CHARGE CAN BE PUNISHED BY FINE AND IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001)  
PRIVACY ACT STATEMENT

Solicitation of the information on this form is authorized by the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the National Labor Relations Board (NLRB) in processing unfair labor practice and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). The NLRB will further explain these uses upon request. Disclosure of this information to the NLRB is voluntary; however, failure to supply the information may cause the NLRB to decline to invoke its processes.



**Attachment**  
**Amended Charge 14-CA-318495**

**8(a)(1):**

1. In early May 2023, the Employer, through (b) (6), (b) (7)(C) , interfered with, restrained, and coerced employees in the exercise of rights protected by the Act by undermining the Union and telling employees that the Union offered no benefits.
2. On or around June 12, 2023, and other dates within the last six months, the Employer, through (b) (6), (b) (7)(C) , interfered with, restrained, and coerced employees in the exercise of rights protected by the Act by making disparaging statements about the Union steward and telling employees that the Union (b) (6), (b) (7)(C) was delaying their raises.
3. On a date within the last six months, the Employer, through (b) (6), (b) (7)(C) , interfered with, restrained, and coerced employees in the exercise of rights protected by the Act by making disparaging comments about the Union and blaming the Union for the fact that employees had not yet received raises.
4. In April or May 2023, the Employer, through (b) (6), (b) (7)(C) , attempted to undermine support for the Union by blaming the Union for the fact that new hires were not paid wages that they were promised during the hiring process.
5. In May or June 2023, the Employer, through (b) (6), (b) (7)(C) , attempted to undermine support for the Union by blaming the Union for failing to show up to a meeting with unit employees that the Employer cancelled and/or rescheduled.
6. On a date within the last six months, the Employer, through (b) (6), (b) (7)(C) (b) (6), (b) (7)(C) , attempted to undermine support for the Union by blaming the Union for negotiations taking a long time.
7. In May 2023, the Employer, through (b) (6), (b) (7)(C) , created an impression that employees' union and other protected concerted activities were under surveillance by stating that (b) (6), (b) (7)(C) knew employees wanted to get pay raises now and refusing to provide the source of (b) (6), (b) (7)(C) knowledge when asked.
8. In May 2023, the Employer, through (b) (6), (b) (7)(C) , interfered with, restrained, and coerced employees in the exercise of rights protected by the Act by interrogating employees about what the Employer was offering at the bargaining table and asking why employees wouldn't accept the Employer's wage offer.
9. On or about March 30, 2023, the Employer, through (b) (6), (b) (7)(C) , in an elevator at Kauffman Stadium, interfered with, restrained, and coerced employees in the exercise of

rights protected by the Act by interrogating employees about whether they were going to participate in negotiations for the collective bargaining agreement.

10. On or about June 12, 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by the Act by asking employees what the union representatives have been talking to them about.
11. On or about April 3, 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by telling employees that they cannot talk to the media.
12. During the last six months, the Employer, through various supervisors, interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by telling employees that they could not stand or walk together in groups or pairs.
13. On or about April 3, 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by telling employees that they could not talk to union representatives at the stadium.
14. Within the last six months, the Employer, through (b) (6), (b) (7)(C), attempted to undermine support for the Union by telling bargaining unit employees they could get pay raises if they decided not to be part of the Union anymore.
15. In April 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by telling employees that they were being watched and photographed by the Employer.
16. In April 2023, the Employer, through (b) (6), (b) (7)(C), surveilled employees by taking photos of them throughout the day.
17. On or about June 12, 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by surveilling employees' union and/or other protected concerted activities and telling employees that (b) (6) had been watching their activities on camera.
18. On or about June 12, 2023, the Employer, through (b) (6), (b) (7)(C), created an impression of surveillance by telling employees (b) (6), (b) (7)(C) knew that a union representative had been in their work area and refusing to explain how (b) (6), (b) (7)(C) knew that when asked.
19. In May or June 2023, the Employer, through (b) (6), (b) (7)(C), surveilled employees in the exercise of union or protected concerted activity by attending a portion of a work group meeting for union representatives and unit employees.
20. On or about January 17, 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the

Act by threatening to remove employees from their work assignments based on their behavior during negotiations.

21. On or about April 3, 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by threatening employees with discipline or termination if they engaged in union or other protected concerted activities, including speaking to the media.
22. On or about April 3, 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by threatening employees with discipline if they engaged in union or other protected concerted activities, including speaking to the media.
23. On or about April 3, 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by threatening employees with discipline if they engaged in union or other protected concerted activities, including talking about or to the Union.
24. Within the last six months, the Employer interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by threatening employees with termination if employees posted disparaging remarks about the Employer on social media.
25. In June 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by threatening employees with unspecified reprisals if they became union stewards.
26. In June 2023, the Employer, through (b) (6), (b) (7)(C), interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by threatening employee stewards with unspecified reprisals for engaging in union and/or other protected concerted activities.
27. Within the last six months, the Employer has interfered with, restrained, and coerced employees in the exercise of rights protected by Section 7 of the Act by maintaining an overly-broad policy that prohibits employees from talking to the media.

8(a)(3):

1. Since on or about (b) (6), (b) (7)(C) 2023, the Employer has discriminated against (b) (6), (b) (7)(C) by assigning (b) (6), (b) (7)(C) to a more isolated work location in retaliation for union activities or to discourage union activities.

2. On some unknown date occurring after (b) (6), (b) (7)(C) 2023, the Employer discriminated against Tollgate Attendants when it stopped scheduling additional employees to operate or run clovers in retaliation for union activity and/or to discourage union activity.

8(a)(5):

Unilateral Changes:

1. On or about April 1, 2023, the Employer failed and refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by making unilateral changes to terms and conditions of employment without providing the Union notice or opportunity to bargain, specifically implementing electronic ticket taker machines.
2. On or January 1, 2023, and again on July 1, 2023, the Employer failed and refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by making unilateral changes to terms and conditions of employment without providing the Union notice or opportunity to bargain, specifically changing the employee share of the health insurance premium without notice and opportunity to bargain.
3. On or about January 1, 2023, the Employer failed and refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by making unilateral changes to terms and conditions of employment without providing the Union notice or opportunity to bargain, specifically refusing to update the amount of union dues deducted per pay period or per event.
4. Within the last six months, the Employer failed and refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by making unilateral changes to terms and conditions of employment without providing the Union notice or opportunity to bargain, specifically offering higher wages to new employees than those set forth in the collective bargaining agreement.
5. On some unknown date occurring after March 20, 2023, the Employer failed and refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by making unilateral changes to terms and conditions of employment without providing the Union notice or opportunity to bargain, specifically by no longer scheduling employees to run clovers or stand behind the tollbooths to operate clovers.

Bad Faith Bargaining:

1. Within the last six months, the Employer has failed and/or refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees for successor contracts for the Ballpark Services Unit, the Event Services Unit, and the Grounds and Tarp Unit. The Employer's bad faith actions included but are not limited to the following:
  - a. Failing to meet at reasonable times and locations;

- b. Failing to designate representatives with authority to enter into agreements;
  - c. Engaging in dilatory tactics to delay agreement;
  - d. Expressing futility in bargaining over non-economic terms;
  - e. Engaging in regressive bargaining;
  - f. Engaging in direct dealing with unit employees at the bargaining table.
2. Within the last six months, the Employer has failed and/or refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by directly dealing with employees regarding their wages.
  3. Within the last six months, the Employer has failed and/or refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by directly dealing with employees by soliciting their priorities for bargaining.
  4. Within the last six months, the Employer has failed and/or refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by requesting that employees contact the Employer directly about wage claim issues.
  5. Within the last six months, the Employer has failed and/or refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by providing misleading information about the status of negotiations and tentative agreements to bargaining unit employees.

Failure to Provide Information:

1. The Employer has failed and/or refused to bargain in good faith with SEIU Local 1 as the collective bargaining representative of its employees by failing and/or refusing to provide the following information requested by SEIU Local 1 for bargaining and/or grievance processing on the dates identified below:

1/17/2023 – Employer's Drug & Alcohol Policy, draft "Code of Conduct" policy, and any other policies which the Employer considers applicable to bargaining unit employees.

1/17/2023 – Unit list with organizational information including supervisory information.

3/7/2023 – Bargaining unit list, source information for Employer's wage proposal and Employer-cited "market study", list of vacancies, staffing numbers.

3/10/2023 – Information regarding the items the Employer has considered chargeable to employees, and a list of those charges.

3/20/2023 – Information regarding the Employer's "time study" and related items.

4/5/2023 – Schedule of workgroup meetings for April 14th, 18, and 19th.

4/10/2023 – Employee handbook and any other policies applicable to GT Unit employees.

4/10/2023 – Bargaining unit list and information regarding health insurance plan levels and periods, qualified and/or enrolled employees, and payroll deduction for employee shares of premiums.

4/10/2023 – Information regarding prorating of employee shares and annual insurance premiums from 2019 to 2023.

4/24/2023 – List of special events with denoted increased pay qualifiers.

4/27/2023 – List of any members whose deductions have been greater or less than the correct amount for this or other 2023 pay periods.

5/17/2023 – Source information for Employer's wage proposal and Employer-cited "market study", including data re the Philadelphia Pirates.

6/12/2023 – Employee handbook and ADA policy documents, including written policy for handling discrimination complaints.

6/20/2023 – Source information for Employer's wage proposal and Employer-cited "market study", including data re the Philadelphia Pirates and from Indeed.com.

6/21/2023 – Monthly hours of work for GT Unit employees for 2019-2023 plan years.

6/27/2023 – Updated bargaining unit list for ES Unit.

6/30/2023 – Records related to termination of 3 employees and related to the alleged “voluntary resignation” of 8 employees.

7/11/2023 – Information regarding Restroom Attendant scheduling and assignments re 5bv pay.

7/11/2023 – Information regarding Ticket Taker scheduling and assignments re 5dv Pay.

7/11/2023 – GT Unit scheduling and assignments re donning and doffing pay.

7/11/2023 – Information regarding payroll deductions of Union dues, and related pay records.



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 17  
8600 Farley St Ste 100  
Overland Park, KS 66212-4677

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (913)967-3000  
Fax: (913)967-3010



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August 1, 2023

(b) (6), (b) (7)(C)

Kansas City Royals Baseball Club LLC  
One Royal Way  
Kansas City, MO 64129

Re: Kansas City Royals Baseball Club LLC  
Case 14-CA-318495

Dear (b) (6), (b) (7)(C):

Enclosed is a copy of the first amended charge that has been filed in this case.

**Investigator:** This charge is being investigated by Field Attorney JULIE M. COVEL whose telephone number is (913)275-6537. If the agent is not available, you may contact Supervisory Field Attorney WILLIAM LEMASTER whose telephone number is (913)275-6524.

**Presentation of Your Evidence:** As you know, we seek prompt resolutions of labor disputes. Therefore, I urge you or your representative to submit a complete written account of the facts and a statement of your position with respect to the allegations in the first amended charge as soon as possible. If the Board agent later asks for more evidence, I strongly urge you or your representative to cooperate fully by promptly presenting all evidence relevant to the investigation. In this way, the case can be fully investigated more quickly.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the

August 1, 2023

Agency's web site ([www.nlr.gov](http://www.nlr.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

ANDREA J. WILKES  
Regional Director

A handwritten signature in dark ink, appearing to read 'S. Wade-Wilhoit', with a stylized flourish at the end.

By:

SUSAN A. WADE-WILHOIT  
Officer in Charge

SAWW:kec

Enclosure: Copy of first amended charge

cc: Joel E. Abrahamson, Attorney  
Stinson LLP  
50 S 6th St Ste 2600  
Minneapolis, MN 55402-2241



**UNITED STATES OF AMERICA**  
**BEFORE THE NATIONAL LABOR RELATIONS BOARD**

**KANSAS CITY ROYALS BASEBALL CLUB  
LLC**

Charged Party

and

**SERVICE EMPLOYEES INTERNATIONAL  
UNION, LOCAL 1**

Charging Party

**Case 14-CA-318495**

**AFFIDAVIT OF SERVICE OF FIRST AMENDED CHARGE AGAINST EMPLOYER**

I, the undersigned employee of the National Labor Relations Board, being duly sworn, say that on August 1, 2023, I served the above-entitled document(s) by regular mail upon the following persons, addressed to them at the following addresses:

**(b) (6), (b) (7)(C)**

Kansas City Royals Baseball Club LLC  
One Royal Way  
Kansas City, MO 64129

Joel E. Abrahamson, Attorney  
Stinson LLP  
50 S 6th St Ste 2600  
Minneapolis, MN 55402-2241

**August 1, 2023**

Date

Karen Clemoens, Designated Agent of NLRB

Name

**/s/ Karen Clemoens**

Signature



UNITED STATES GOVERNMENT  
NATIONAL LABOR RELATIONS BOARD

SUBREGION 17  
8600 Farley St Ste 100  
Overland Park, KS 66212-4677

Agency Website: [www.nlrb.gov](http://www.nlrb.gov)  
Telephone: (913)967-3000  
Fax: (913)967-3010



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August 1, 2023

Chris Rak  
Service Employees International  
Union, Local 1  
2725 Clifton Ave.  
St. Louis, MO 63139

Re: Kansas City Royals Baseball Club LLC  
Case 14-CA-318495

Dear Mr. Rak:

We have docketed the first amended charge that you filed in this case.

**Investigator:** This charge is being investigated by Field Attorney JULIE M. COVEL whose telephone number is (913)275-6537. If the agent is not available, you may contact Supervisory Field Attorney WILLIAM LEMASTER whose telephone number is (913)275-6524.

**Presentation of Your Evidence:** As the party who filed the charge in this case, it is your responsibility to meet with the Board agent to provide a sworn affidavit, or provide other witnesses to provide sworn affidavits, and to provide relevant documents within your possession. If you have additional evidence regarding the allegations in the first amended charge and you have not yet scheduled a date and time for the Board agent to obtain that evidence, please contact the Board agent to arrange to present that evidence. If you fail to cooperate in promptly presenting your evidence, your charge may be dismissed.

**Preservation of all Potential Evidence:** Please be mindful of your obligation to preserve all relevant documents and electronically stored information (ESI) in this case, and to take all steps necessary to avoid the inadvertent loss of information in your possession, custody or control. Relevant information includes, but is not limited to, paper documents and all ESI (e.g. SMS text messages, electronic documents, emails, and any data created by proprietary software tools) related to the above-captioned case.

**Prohibition on Recording Affidavit Interviews:** It is the policy of the General Counsel to prohibit affiants from recording the interview conducted by Board agents when subscribing Agency affidavits. Such recordings may impede the Agency's ability to safeguard the confidentiality of the affidavit itself, protect the privacy of the affiant and potentially compromise the integrity of the Region's investigation.

**Procedures:** Pursuant to Section 102.5 of the Board's Rules and Regulations, parties must submit all documentary evidence, including statements of position, exhibits, sworn statements, and/or other evidence, by electronically submitting (E-Filing) them through the Agency's web site ([www.nlr.gov](http://www.nlr.gov)). You must e-file all documents electronically or provide a written statement explaining why electronic submission is not possible or feasible. Failure to comply with Section 102.5 will result in rejection of your submission. The Region will make its determination on the merits solely based on the evidence properly submitted. All evidence submitted electronically should be in the form in which it is normally used and maintained in the course of business (i.e., native format). Where evidence submitted electronically is not in native format, it should be submitted in a manner that retains the essential functionality of the native format (i.e., in a machine-readable and searchable electronic format). If you have questions about the submission of evidence or expect to deliver a large quantity of electronic records, please promptly contact the Board agent investigating the charge.

If the Agency does not issue a formal complaint in this matter, parties will be notified of the Regional Director's decision by email. Please ensure that the agent handling your case has your current email address.

Very truly yours,

ANDREA J. WILKES  
Regional Director

A handwritten signature in dark ink, appearing to read 'S. Wade-Wilhoit', with a stylized flourish at the end.

By:

SUSAN A. WADE-WILHOIT  
Officer in Charge

SAWW:kec  
Enclosure

cc: Michele Cotrupe  
Service Employees International  
Union, Local 1  
111 E. Wacker Dr., Suite 1700  
Chicago, IL 60601